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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 5, 1998

EX PARTE

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

FILE COPY ORIGINAL

Re: Ex Parte in CC Docket No. 97-231; CC Docket No. 97-121; CC Docket No. 97-
208; CC Docket No. 97-137

Dear Ms. Salas:

The attached document entitled "Joint CLEC/Bell Atlantic Proposal, Principles of Change Management" was submitted to Lisa Choi of the Common Carrier Bureau today. Please place this document in the above-referenced dockets.

In accordance with Section 1.1206(b)(2) of the Commission's Rules, an original and one copy of this notice are being submitted to the Secretary.

Sincerely,

Lisa B. Smith
Senior Policy Counsel

cc: Lisa Choi

JOINT CLEC / BELL ATLANTIC PROPOSAL

PRINCIPLES OF
CHANGE MANAGEMENT

FINAL VERSION
January 28, 1998

Preamble

This document is intended to supplement rather than replace any state or federal requirements or provisions regarding notice of changes, including, without limitation, changes pursuant to 47 C.F.R. Sections 51.325-51.335, and, except as specifically provided herein, each party reserves the right to seek full application or enforcement of such federal or state requirements or provisions. The underlying principles are expected to act as a practical guide to all parties for implementing change control practices and procedures which not only comply with all laws, rules and regulations but also comply with the need of the industry to appropriately manage the change control process.

Specific notice has been taken by the parties of the public notice requirements of section 251(c) of the Telecommunications Act of 1996 as implemented in the FCC's Order in Re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Second Report and Order, CC Docket 96-98, FCC 96-333 (hereinafter "Local Competition Second Report and Order"). See 47 C.F.R. SS 51.325-51.335. The Local Competition Second Report and Order includes specific public notice requirements as it relates to decisions to implement a network change which impacts a network interface.

Introduction

This document outlines the principles applicable to change management ("Principles"). These Principles are intended to establish a framework for developing a formal change control process between Bell Atlantic and the CLEC community. It should be recognized by all parties that deviations from these Principles may be warranted where unanticipated circumstances arise such that strict application to these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory requirements. Parties shall provide appropriate notice and seek agreement of CLEC/Bell Atlantic Change Control Review Team participants prior to deviating from the principles established within this document.

1. SCOPE OF THE CHANGE CONTROL PRINCIPLES

These Principles are intended to address changes to Operational Support System (OSS) interfaces (pre-service, ordering, maintenance and billing) that affect or are reasonably likely to affect another carrier's performance or ability to provide service through resale, unbundled elements or facilities. Section 5 categorizes the OSS interface changes subject to these Principles. These Principles are not intended to address issues such as cost, liability etc.

2. OBJECTIVES OF THE CHANGE CONTROL PRINCIPLES

- Ensure continuity of business processes and systems operations.
- Establish a process for communicating, managing and scheduling changes.
- Allow for impact assessment, resource planning and appropriate testing.
- Prioritization of CLEC changes.

3. ASSUMPTIONS

- All parties will comply with all legal and regulatory requirements.
- CLECs and Bell Atlantic will define single points of contact in each of their companies for communicating and coordinating change notification.
- All change requests and notifications are made in writing.
- Change notification occurs in advance of implementation to allow for assessment and testing.
- Bell Atlantic will assign Change Control tracking numbers.
- Bell Atlantic will assign Release tracking numbers.
- Bell Atlantic will be responsible for systems testing. CLECs will be given the opportunity to perform individual testing with Bell Atlantic as necessary prior to implementation.
- Time durations mentioned below are in calendar days unless otherwise indicated.
- Changes addressed by this document will be implemented for the CLEC community in general.
- CLECs are certified to do business in the Bell Atlantic territory.
- Where CLEC agreement is required or contemplated, in the absence of unanimous agreement by all CLECs, Bell Atlantic may proceed as it deems appropriate, in conformance with all applicable federal and state laws, rules and regulations.

4. KEY PROCESS ELEMENTS

- Notification Of Change - Bell Atlantic notifies each CLEC, in writing, of the change.
- Documentation - Specifications which are unique or differ from the industry standard and associated business rules that detail the specific change will be provided to each CLEC. Bell Atlantic will specify what industry standard the changes are based upon.
- Assessment Of Change - There will be a period of time to review the impact of the change.
- Release Planning – The activity of defining what, how and when the change will be implemented, to include contingency operations.

- **Baseline Document (If Different Than Original Document)** - The document that reflects the actual change.
- **Development** - Period of time that CLECs and Bell Atlantic perform systems related work in preparation for the change.
- **Testing** - Joint Bell Atlantic and CLEC testing will be available prior to CLEC implementation.
- **Implementation of Change** - The date the change takes effect.
- **Decommission (of older version)** - The older version is no longer being supported and is being retired.

5. CHANGE CLASSIFICATION

- **Types of Changes (all "planned" except for Type 1)**
 - * **Type 1** - Changes to systems/processes that require immediate implementation to correct error conditions or other situations impacting normal day-to-day operations.
 - * **Type 2** - Changes to systems/processes that are required to meet specific regulatory obligations.
 - * **Type 3** - Changes to systems/processes for industry standard releases (such as upgrading from LSR 2 to LSR 3 as implemented in an EDI standard).
 - * **Type 4** - Changes to systems/processes that are related to upgrades and enhancements as well as preplanned maintenance changes that originate from Bell Atlantic.
 - * **Type 5** - Changes to systems/processes that are related to upgrades and enhancements that originate from the CLEC community.
- **Categories of Changes**
 - * **Category A** - Changes which impact interfaces or interface operations.
 - * **Category B** - Interface changes which impact business processes (applicable to Type 1, Type 4, and Type 5 changes only). [NOTE: Mr. Davis of Intermedia has raised a concern regarding Category B change. Bell Atlantic intends to work with Intermedia to resolve the concern.]

6. NOTIFICATION - TIMELINE

- **Type 1 Changes** - Individual Case Basis based upon severity of problem.
- **Type 2 Changes** - Individual Case Basis based upon applicable law/regulatory rules.
- **Type 3 Changes** - Based upon mutual agreement in conjunction with the rollout of national standards subject to any overriding regulatory obligations (including, without limitation, Bell Atlantic's merger commitments to the FCC). (See illustrative

example of industry standard interface introduction depicted in attached estimated/projected timelines [p.3 of 8] attached) .

- Type 4 / Category A Changes* - No less than 45 days notice with documentation and compliance with regulatory obligations.
- Type 4 / Category B Changes – No less than 30 days notice with documentation (if needed) and compliance with regulatory obligations.
- Type 5 / Category A Changes - Based upon mutual agreement and compliance with regulatory obligations.
- Type 5 / Category B Changes - Based upon mutual agreement and compliance with regulatory obligations.

* The 45 day interval for Type 4 changes is expected to be the norm, assuming utilization of the FCC's short term notification process, and notwithstanding Bell Atlantic's right to provide a shorter notice pursuant to said short term notification process; in some instances it will make sense to provide more notification, or less notification, based upon the severity and the impact of the change. For example, if the change has benefit and has little material impact on the interface, Bell Atlantic can implement the changes in less than 45 days, in compliance with FCC and state rules.

7. DOCUMENTATION

- Standard CLEC Change Control Request/Bell Atlantic Notification Form (Attachment A).
- Documentation will contain business rules, transactions, data elements and business processes that impact the interface.
- Specifications will include date & version number, summary of changes, change bars where applicable.
- Bell Atlantic will provide a document that contains planned release contents, contingency/disaster recovery operations and a release schedule
- Category B changes will include appropriate documentation (updated process flows, contact lists, etc.)
- Periodically, Bell Atlantic and CLECs will exchange their long-term forecasts for contemplated releases impacting the interface. These forecasts are general in nature and are to be considered non-binding. CLEC s may provide this information on a proprietary basis, as necessary.

8. ASSESSMENT

- For Type 5 Changes - Joint CLEC / Bell Atlantic Change Control Review Team
 - * Establishes common understanding of CLEC proposed changes.

- * Establishes target release schedule and milestones.
- * 15 business day assessment period following presentation to the CLEC / Bell Atlantic Change Control Review Team.
- For Type 4 Changes – 15 business day assessment period by CLECs (notwithstanding a shorter period permitted to Bell Atlantic by “short term” notice provisions).
- For Type 3 Changes - Based upon mutual agreement subject to any overriding regulatory obligations.

9. DEVELOPMENT & TESTING

- Separate system environments for testing & production, where applicable.
- Based upon contractual agreements, where applicable

10. IMPLEMENTATION & DECOMMISSION

- Only the 2 most current versions will be valid at any time, with a 3rd version available as a contingency for a limited period of time.
- Oldest production version will be retired 30 days after the availability of the newest version
- The version being replaced will be frozen from Type 4 and Type 5 changes 60 days prior to the implementation date of the newest version. Notification of the last enhancement will be the same as previously outlined in section 6.

11. CLEC / Bell Atlantic Change Control Review Team

The Joint CLEC/Bell Atlantic Change Control Review Team is responsible for:

- Reviewing change notifications/requests
- Agreeing on change classifications
- Seeking consensus on the prioritization of changes (all types)
- Reviewing impact assessments
- Developing release plans
- Creating and tracking changes to the baseline document

The joint CLEC / Bell Atlantic Change Control Review Team will be structured and conducted as follows:

- Comprised of representatives from the CLEC and Bell Atlantic companies
- Open to all CLECs
- CLECs can participate at meetings with several representatives, however, each CLEC will have a single spokesperson
- Meetings shall take place each month. Unless otherwise specified, these meetings will take place in New York City. Attendees have the option of participating via a conference bridge.
- The agenda will be set in advance and distributed to Team members 1 week prior to each meeting. Agenda items may be submitted up to two weeks prior to the scheduled meeting.
- A matrix detailing the items before the Team and their status will be maintained and used as meeting minutes. Meeting minutes will be distributed 1 week following each meeting.
- Bell Atlantic will be responsible for facilitating the meeting.
- Bell Atlantic will be responsible for meeting agenda, logistics, preparing, and distributing meeting minutes.
- Team meetings are working sessions

12. PROCESSES

More detailed processes to implement these Principles shall be agreed upon between Bell Atlantic and the CLECs.

13. DEFINITIONS

- **Baseline Document** *[Note: the parties disagree on whether the product of the collaborative constitutes a baseline document. This issue is identified as issue 196 on the issues matrix]*
 - The baseline is the current version of particular specifications for the current version of transactions, data elements and business rules that impact the OSS interfaces. Changes to that interface, with associated baseline changes, are subject to appropriate review, as described above by the CLEC/Bell Atlantic Change Control Review Team (CBRT). The parties recognize that there also may be changes that would impact the interface altering the way a CLEC performs other functions, (e.g billing). These issues are not precluded from CBRT discussion.
- **Business Rules** The various processes and conditions necessary to be operational as a CLEC with Bell Atlantic that impact the interface (for example, the data elements

and data necessary to support a transaction).

- ***Industry Standard*** The Alliance for Telecommunications Industry Solutions (ATIS) defined national electronic interface specification
- ***Interface*** The message formats and message exchange protocols that define exchange transactions between CLECs and Bell Atlantic.
- ***Interface Operations*** The physical interconnection and services provided via the interface.
- ***Release*** The introduction of new code via the change control process.

ATTACHMENT A

DATE SUBMITTED: _____

DATE CLOSED: _____

TRACKING NUMBER: _____

CLEC Change Control Requests/Bell Atlantic Notifications

The following information is required for all Change Requests/Notification:

1. High Level Summary of Change

This information should describe, at a high level, the change being requested.

2. Reason for Change

This information should describe the rationale for the change being requested.

3. Timeframe

What timeframe is anticipated for this change? Is it required immediately? Is it required by 3Q99? Explain.

4. Detailed Description of Change

Include any data element changes, business processes, and technical requirements.

5. Jurisdictions Impacted

Include the states / regions that will be impacted by this change.

6. Regulatory Information

If you believe that this change request/notification is required based on a regulatory requirement, please indicate the necessary information here.

7. Contact Information

Name

Date

E-mail Address

Telephone #

Postal Address

8. Type & Category of Change

9. Priority (High, Medium, Low)